



# ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

### MAJOR SOURCE OPERATING PERMIT

Permittee: Sessions Company, Inc.

Facility Name: Sessions Company, Inc.

Facility No.: 602-0004

Location: Enterprise, AL

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, <u>Ala. Code</u> §§22-28-1 to 22-28-23 (2006 Rplc. Vol. and 2007 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, <u>Ala. Code</u> §§22-22A-1 to 22-22A-15 (2006 Rplc. Vol. and 2007 Cum. Supp.), and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.

**Issuance Date:** 

Expiration Date: January 24, 2015

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Fede	rally Enforceable Provisos	Regulations
1.	Transfer	
	This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in Rule 335-3-1613(1)(a)5.	Rule 335-3-1602(6)
2.	Renewals	
	An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.	Rule 335-3-1612(2)
	The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.	
3.	Severability Clause	
	The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivision, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.	Rule 335-3-1605(e)
4.	Compliance	
	(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.	Rule 335-3-1605(f)

erally Enforceable Provisos	Regulations
(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance conditions of this permit would have required ha or reducing the permitted activity.	
<u>Termination for Cause</u>	
This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a requesthe permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planne changes or anticipated noncompliance will not stay any permit condition.	ed
Property Rights	
The issuance of this permit does not convey any proper rights of any sort, or any exclusive privilege.	Rule 335-3-1605(i)
Submission of Information	
The permittee must submit to the Department, within 3 days or for such other reasonable time as the Department may set, any information that the Department may require in writing to determine whether cause exists for modify revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.	ent uest ing, ga
Economic Incentives, Marketable Permits, and Emissions Trading	
No permit revision shall be required, under any approve economic incentives, marketable permits, emissions tra and other similar programs or processes for changes the are provided for in this permit.	ading
Certification of Truth, Accuracy, and Completeness	;
Any application form, report, test data, monitoring data compliance certification submitted pursuant to this per shall contain certification by a responsible official of tru accuracy, and completeness. This certification shall stathat, based on information and belief formed after reasonable inquiry, the statements and information in	rmit uth, ate
	(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance conditions of this permit would have required had or reducing the permitted activity.  Termination for Cause  This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a reque the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planm changes or anticipated noncompliance will not stay any permit condition.  Property Rights  The issuance of this permit does not convey any proper rights of any sort, or any exclusive privilege.  Submission of Information  The permittee must submit to the Department, within a days or for such other reasonable time as the Department may set, any information that the Department may req in writing to determine whether cause exists for modify revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving specific request, the permittee shall also furnish to the Department copies of records required to be kept by the permit.  Economic Incentives, Marketable Permits, and Emissions Trading  No permit revision shall be required, under any approve economic incentives, marketable permits, emissions trained other similar programs or processes for changes the are provided for in this permit.  Certification of Truth, Accuracy, and Completeness  Any application form, report, test data, monitoring data compliance certification submitted pursuant to this per shall contain certification by a responsible official of traccuracy, and completeness. This certification shall st that, based on information and belief formed after

rede	rally 1	Enforceable Provisos	Regulations				
0.	Insp	ection and Entry					
	may repr Envi	n presentation of credentials and other documents as be required by law, the permittee shall allow authorized esentatives of the Alabama Department of tronmental Management and EPA to conduct the wing:	Rule 335-3-1607(b)				
	(a)	Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit;					
	(b)	Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;					
	(c)	Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;					
	(d)	Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.					
1.	Compliance Provisions						
	(a)	The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.	Rule 335-3-1607(c)				
	(b)	The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.					
2.	Compliance Certification						
		mpliance certification shall be submitted on March 26 of calendar year.	Rule 335-3-1607(e)				
	(a)	The compliance certification shall include the following:					
		(1) The identification of each term or condition of this permit that is the basis of the certification;					

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		(2)	The compliance status;		
		(3)	The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with Rule 335-3-1605(c) (Monitoring and Recordkeeping Requirements);		
		(4)	Whether compliance has been continuous or intermittent;		
		(5)	Such other facts as the Department may require to determine the compliance status of the source;		
	(b)	The	compliance certification shall be submitted to:		
13.		Aiı	Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463 and to:  and EPCRA Enforcement Branch EPA Region IV 61 Forsyth Street, SW Atlanta, GA 30303  for Cause		
10.	Unde	er any	of the following circumstances, this permit will be rior to the expiration of the permit:	Rule 335-3-1613(5)	
	(a)	Air A with years than appli requ	tional applicable requirements under the Clean act of 1990 become applicable to the permittee a remaining permit term of three (3) or more s. Such a reopening shall be completed not later eighteen (18) months after promulgation of the cable requirement. No such reopening is ired if the effective date of the requirement is than the date on which this permit is due to re.		

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	(b)	requi sourd by th	cional requirements (including excess emissions rements) become applicable to an affected ce under the acid rain program. Upon approval te Administrator, excess emissions offset plans be deemed to be incorporated into this permit.	
	(c)	conta state	Department or EPA determines that this permit ains a material mistake or that inaccurate ments were made in establishing the emissions dards or other terms or conditions of this permit.	
	(d)	this p	Administrator or the Department determines that permit must be revised or revoked to assure pliance with the applicable requirements.	
14.	Addi	tional	Rules and Regulations	
	exist Rule	ing on s and F	is issued on the basis of Rules and Regulations the date of issuance. In the event additional Regulations are adopted, it shall be the permit ponsibility to comply with such rules.	§22-28-16(d), Code of Alabama 1975, as amended
15.	<u>Equi</u>	pment		
	(a)	equipos issue main equipos twen shute the s	e case of shutdown of air pollution control oment (which operates pursuant to any permit of by the Director) for necessary scheduled tenance, the intent to shut down such oment shall be reported to the Director at least ty-four (24) hours prior to the planned down, unless such shutdown is accompanied by hutdown of the source which such equipment is ded to control. Such prior notice shall include, is not limited to the following:	Rule 335-3-107(1), (2
		(1)	Identification of the specific facility to be taken out of service as well as its location and permit number;	
		(2)	The expected length of time that the air pollution control equipment will be out of service;	
		(3)	The nature and quantity of emissions of air contaminants likely to occur during the	

<sup>r</sup> Enforce	able Provisos	Regulations
(4)	Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;	
(5)	The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.	
or up is exp conta stand shall worki pertir the bi	set of process in such a manner as to cause, or bected to cause, increased emissions of air minants which are above an applicable lard, the person responsible for such equipment notify the Director within 24 hours or the next ng day and provide a statement giving all nent facts, including the estimated duration of reakdown. The Director shall be notified when	
eration o		
tich this perated at a sissions of above education to the contraction of the contraction	permit is issued shall be maintained and all times in a manner so as to minimize the fair contaminants. Procedures for ensuring that quipment is properly operated and maintained so ize the emission of air contaminants shall be	§22-28-16(d), Code of Alabama 1975, as amended
noxious	<u>Odors</u>	
noxious o rified by A orous emi e Alabama at these n	dors arising from the plant operations be air Division inspectors, measures to abate the issions shall be taken upon a determination by a Department of Environmental Management	Rule 335-3-108
gitive Du		
	utions shall be taken to prevent fugitive dust	Rule 335-3-402
	(4)  In the or up is expected at the brownian department of the properation of the proper	(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;  (5) The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.  In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director shall be notified when the breakdown has been corrected.  Deration of Capture and Control Devices  air pollution control devices and capture systems for nich this permit is issued shall be maintained and erated at all times in a manner so as to minimize the hissions of air contaminants. Procedures for ensuring that e above equipment is properly operated and maintained so to minimize the emission of air contaminants shall be tablished.  Demoxious Odors  The procedure and capture and maintained so to minimize the emission of air contaminants shall be tablished.  Demoxious Odors  The procedures for ensuring that the emission inspectors, measures to abate the orous emissions shall be taken upon a determination by the Alabama Department of Environmental Management at these measures are technically and economically sisble.

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	(b)	in th airbo follov	t or haul roads and grounds will be maintained e following manner so that dust will not become orne. A minimum of one, or a combination, of the wing methods shall be utilized to minimize orne dust from plant or haul roads and grounds:	
		tl d	by the application of water any time the surface of the road is sufficiently dry to allow the creation of the ust emissions by the act of wind or vehicular raffic;	
		(2)	By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;	
		(3)	By paving;	
		(4)	By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;	
	adeq and a exclu contr Alter	uately ground isively rol tech native	, or a combination, of the above methods fail to reduce airborne dust from plant or haul roads is, alternative methods shall be employed, either or in combination with one or all of the above iniques, so that dust will not become airborne. methods shall be approved by the Department ization.	
19.	<u>Addi</u>	tions a		
			eations to this source shall comply with the n procedures in Rules 335-3-1613 or 335-3-16-	Rule 335-3-1613 an .14
20.		ordkee:	ping Requirements	
20.		Reco	rds of required monitoring information of the ce shall include the following:	Rule 335-3-1605(c)2
20.	Reco	Reco	rds of required monitoring information of the	Rule 335-3-1605(c)2
20.	Reco	Reco	rds of required monitoring information of the ce shall include the following:  The date, place, and time of all sampling or	Rule 335-3-1605(c)2

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	(4) The analytical techniques or methods used;	
	(5) The results of all analyses; and	
	(6) The operating conditions that existed at the time of sampling or measurement.	
	(b) Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit.	
21.	Reporting Requirements	
	(a) Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with Rule 335-3-1604(9).	Rule 335-3-1605(c)3.
	(b) Deviations from permit requirements shall be reported within 48 hours or 2 working days of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.	
<b>22</b> .	Emission Testing Requirements	
	Each point of emission which requires testing will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.	Rule 335-3-105(3) and Rule 335-3-1- .04(1)
	The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.	

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	To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:  (1) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.			
			Rule 335-3-104	
	(2)	A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures require probe cleaning).		
	(3)	A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.		
	(4)	A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.		
	own and	etest meeting may be held at the request of the source er or the Air Division. The necessity for such a meeting the required attendees will be determined on a case-by- basis.	Rule 335-3-104	
	30 d	est reports must be submitted to the Air Division within ays of the actual completion of the test unless an unsion of time is specifically approved by the Air Division.		
23.	<u>Payı</u>	ment of Emission Fees		
		ual emission fees shall be remitted each year according are fee schedule in ADEM Admin. Code R. 335-1-704.	Rule 335-1-704	
24.	Othe	er Reporting and Testing Requirements		
	Other Reporting and Testing Requirements  Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.		Rule 335-3-104(1)	

Fede	rally I	Enforc	Regulations	
25. <u>Title VI Requirements (Refrigerants)</u>			equirements (Refrigerants)	
	inclu Clas 82, S and prac recyc	iding a s II ozo Subpar mainta tices, p	having appliances or refrigeration equipment, ir conditioning equipment, which use Class I or one-depleting substances as listed in 40 CFR Part et A, Appendices A and B, shall service, repair, ain such equipment according to the work personnel certification requirements, and certified and recovery equipment specified in 40 CFR Part et F.	335-3-1605(a)
	No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F.			
	The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the US EPA and the Department as required.			
<b>26</b> .	Che	mical A	Accidental Prevention Provisions	
	If a chemical listed in Table 1 of 40 CFR Part 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:			40 CFR Part 68
	(a)		owner or operator shall comply with the isions in 40 CFR Part 68.	
	(b)		owner or operator shall submit one of the wing:	
		(1)	A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR Part 68 § 68.10(a) or,	
		(2)	A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.	
<b>27</b> .	Disp	lay of	<u>Permit</u>	
	at th locat	e site v ted and	t shall be kept under file or on display at all times where the facility for which the permit is issued is I will be made readily available for inspection by bersons who may request to see it.	Rule 335-3-1401(1)(d)

Fede	rally F	Enforceable Provisos	Regulations
28.	Circ	<u>umvention</u>	
	any o redu conc	erson shall cause or permit the installation or use of device or any means which, without resulting in ction in the total amount of air contaminant emitted, eals or dilutes any emission of air contaminant which d otherwise violate the Division 3 rules and regulations.	Rule 335-3-110
29.	Visit	ole Emissions	
	this disch than sour emis 40 C	ss otherwise specified in the Unit Specific provisos of permit, any source of particulate emissions shall not harge more than one 6-minute average opacity greater 20% in any 60-minute period. At no time shall any ce discharge a 6-minute average opacity of particulate sions greater than 40%. Opacity will be determined by FR Part 60, Appendix A, Method 9, unless otherwise ified in the Unit Specific provisos of this permit.	Rule 335-3-401(1)
<b>30</b> .	<u>Fuel</u>	-Burning Equipment	
	(a)	Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Part 335-3-403.	Rule 335-3-403
	(b)	Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Part 335-3-501.	Rule 335-3-501
31.	Proc	ess Industries – General	
	this	ss otherwise specified in the Unit Specific provisos of permit, no process may discharge particulate emissions access of the emissions specified in Part 335-3-404.	Rule 335-3-404
<b>32</b> .	Aver	raging Time for Emission Limits	
	for th	ss otherwise specified in the permit, the averaging time ne emission limits listed in this permit shall be the inal time required by the specific test method.	Rule 335-3-105

ally Enforceable Provisos	Regulations
Compliance Assurance Monitoring (CAM)	40 CFR 64
Conditions (a) through (d) that follow are general conditions applicable to emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the unit specific provisos and the attached CAM appendices.	
(a) Operation of Approved Monitoring	40 CFR 64.7
(1) Commencement of operation. The owner or operator shall conduct the monitoring required under this section and detailed in the unit specific provisos and CAM appendix of this permit (if required) upon issuance of the permit, or by such later date specified in the permit pursuant to §64.6(d).	
(2) Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.	
(3) Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.	

#### Federally Enforceable Provisos

#### Regulations

- (4) Response to excursions or exceedances. (a) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutantspecific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. (b) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
- (5) Documentation of need for improved monitoring. After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Department and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

erally Enfo	rceable Provisos	Regulations
(b) Quali	ty Improvement Plan (QIP) Requirements	40 CFR 64.8
Se pe op wi ap ex du op in a fo sp	ased on the results of a determination made under ection 33(a)(4)(b) above, the Administrator or the ermitting authority may require the owner or perator to develop and implement a QIP. Consistent of the 40 CFR §64.6(c)(3), the permit may specify an appropriate threshold, such as an accumulation of accedances or excursions exceeding 5 percent aration of a pollutant-specific emissions unit's perating time for a reporting period, for requiring the applementation of a QIP. The threshold may be set at thigher or lower percent or may rely on other criteria or purposes of indicating whether a pollutant-pecific emissions unit is being maintained and perated in a manner consistent with good air follution control practices.	
(2) E	ements of a QIP:	
a.	The owner or operator shall maintain a written QIP, if required, and have it available for inspection.	
b.	The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:	
	i. Improved preventive maintenance practices.	
	ii. Process operation changes.	
	iii. Appropriate improvements to control methods.	
	iv. Other steps appropriate to correct control performance.	
	v. More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (2)(b)(i) through (iv) above).	

y Enfo	rceable Provisos	Regulations
de pra pe the	a QIP is required, the owner or operator shall velop and implement a QIP as expeditiously as acticable and shall notify the Department if the riod for completing the improvements contained in e QIP exceeds 180 days from the date on which the ed to implement the QIP was determined.	
su 33 ow	llowing implementation of a QIP, upon any bsequent determination pursuant to Section (a)(4)(b) above, the Department may require that an mer or operator make reasonable changes to the P if the QIP is found to have:	
a.	Failed to address the cause of the control device performance problems; or	
b.	Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.	
or ex ex rec fec	plementation of a QIP shall not excuse the owner operator of a source from compliance with any isting emission limitation or standard, or any isting monitoring, testing, reporting or cordkeeping requirement that may apply under deral, state, or local law, or any other applicable quirements under the Act.	
Repo	rting and Recordkeeping Requirements	40 CFR 64.9
(1) Ge	eneral reporting requirements	
a.	On and after the date specified in Section 33(a)(1) above by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with ADEM Admin. Code R. 335-3-1605(c)3.	
b.	A report for monitoring under this part shall include, at a minimum, the information required under ADEM Admin. Code R. 335-3-1605(c)3. and the following information, as applicable:	

ierally Enfo	rceable Provisos	Regulations
	i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;	
	<ul> <li>Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and</li> </ul>	
	iii. A description of the actions taken to implement a QIP during the reporting period as specified in Section 33(b) above. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.	
(2) Ge	eneral recordkeeping requirements.	
a.	The owner or operator shall comply with the recordkeeping requirements specified in ADEM Admin. Code R. 335-3-1605(c)2 The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to Section 33(b) above and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).	
b.	Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	

Federally E	Regulations	
(d) Sa	vings Provisions	40 CFR 64.10
(1)	Nothing in this part shall:	
a.	Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.	
b.	Restrict or abrogate the authority of the Department to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.	
c.	Restrict or abrogate the authority of the Department to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.	

### **Summary Page for Peanut Receiving System**

Permitted

**Operating Schedule:** 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8,760 Hrs/yr

Emission Point #	Description	Pollutant	Emission limit	Regulation
001A	Receiving for Warehouses No. 4, 8, and 27	Fugitive - PM	N/A	ADEM Admin. Code R. 335-3-402
001B	Receiving System for Warehouses No. 28 and 29	Fugitive - PM	N/A	ADEM Admin. Code R. 335-3-402
001C	Peanut Receiving System	Fugitive - PM	N/A	ADEM Admin. Code R. 335-3-402
001D	Peanut Loading System at Warehouses No. 28, 29, and 30	Fugitive - PM	N/A	ADEM Admin. Code R. 335-3-402
001E	Receiving System for Warehouses No. 30 and 31	Fugitive - PM	N/A	ADEM Admin. Code R. 335-3-402

# **Provisos for Peanut Receiving System**

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-1603
2. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-402, "Fugitive Dust and Fugitive Emissions".	ADEM Admin. Code R. 335-3-402
Emission Standards	
1. There are no unit specific emissions standards for this unit.	N/A
Compliance and Performance Test Methods and Procedures	
1. There are no unit specific compliance and performance test methods and procedures for this unit.	N/A
Emission Monitoring	
1. There are no unit specific emissions monitoring requirements for this unit.	N/A
Recordkeeping and Reporting Requirements	
<ol> <li>There are no unit specific recordkeeping and reporting requirements for this unit.</li> </ol>	N/A

## Summary Page for 24 TPH Farmer's Stock Cleaner

**Permitted Operating Schedule:** 4,000 Hrs/yr

Emission Point #	Description	Pollutant	Emission limit	Regulation
002	24 TPH Farmer's Stock Cleaner with Baghouse common to Z037	PM	2.28 lb/hr (4.56 TPY)	ADEM Admin. Code R. 335-3-1404
002	24 TPH Farmer's Stock Cleaner with Baghouse common to Z037	Opacity	20% (6-minute average)	ADEM Admin Code R. 335-3-401(1)(a)&(b)

### **Provisos for 24 TPH Farmer's Stock Cleaner**

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-1603
2. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-401(1), "Visible Emissions".	ADEM Admin. Code R. 335-3-401(1)
3. The source permitted under this unit has enforceable limits in place in order to prevent it from being subject to the provisions of ADEM Admin. Code R. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration].	ADEM Admin. Code R. 335-3-1404
Emission Standards	
1. This process shall not operate more than 4,000 hours during any consecutive twelve (12) month period.	ADEM Admin. Code R. 335-3-1404
2. Particulate matter (PM) emissions from this process shall not exceed 2.28 lb/hr (4.56 TPY).	ADEM Admin. Code R. 335-3-1404
Compliance and Performance Test Methods and Procedures	
1. If testing is required, particulate emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code R. 335-3-105
2. If testing is required, visible emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code R. 335-3-105
<b>Emission Monitoring</b>	
1. A properly maintained and operated device shall be utilized to measure the pressure differential across the baghouse. The device shall be located at eye level and be easily accessible for inspections by Air Division and plant personnel.	ADEM Admin. Code 335-3-1605(c)(2)
2. The emissions from the baghouse shall be visually observed a minimum of once per day to determine if visible emissions are present.	ADEM Admin. Code 335-3-1605(c)(2)
3. The facility shall inspect and clean the baghouse no less frequently than annually and whenever the observed visible emissions are greater than normal.	ADEM Admin. Code 335-3-1605(c)(2)

Federally Enforceable Provisos	Regulations
4. Corrective action must be taken within four (4) hours when visible emissions are observed. Maintenance shall be performed as needed.	ADEM Admin. Code 335-3-1605(c)(2)
5. Pressure drop across the baghouse shall be monitored and recorded daily while the unit is operating.	ADEM Admin. Code 335-3-1605(c)(2)
6. A pressure drop excursion shall be defined as a pressure drop less than one (1) inch of water and greater than eight (8) inches of water.	ADEM Admin. Code 335-3-1605(c)(2)
7. When a pressure drop excursion occurs, corrective action shall be taken within four (4) hours to identify and correct the problem.	ADEM Admin. Code 335-3-1605(c)(2)
Recordkeeping and Reporting Requirements	
1. Records of the date, time, and observed opacity of the daily visible emissions observations, inspections, corrective actions taken, and maintenance of this source shall be recorded in a logbook. These records shall be retained for a minimum of five (5) years and made available upon request.	ADEM Admin. Code 335-3-1605(c)(2) 40 CFR 64
2. The date, time, and daily baghouse pressure drop observations, for this source shall be recorded in a logbook. These records shall be retained for a minimum of five (5) years and made available upon request.	ADEM Admin. Code 335-3-1605(c)(2) 40 CFR 64
3. Records of the process operating hours, including monthly and twelve (12) month rolling totals, shall be kept in a permanent form suitable for inspection. These records shall be retained for a minimum of five (5) years and made available upon request.	ADEM Admin. Code 335-3-1605(c)(2)
4. A semi-annual report shall be submitted to the Air Division within 60 days of the end of the six (6) month reporting period. This report shall contain the following:	ADEM Admin. Code 335-3-1605(c)(3) 40 CFR 64
(a) All visible emissions excursions to include the date, time, cause of the visible emissions excursion, and the corrective action taken.	
(b) All pressure drop excursions to include time, date, observed pressure drop, cause of the pressure drop excursions, and the corrective action taken.	
(c) A statement certifying that the inspections were accomplished as required.	

## Summary Page for 24 TPH Old Shelling Plant

**Permitted Operating Schedule:** 4,000 Hrs/yr

Emission Point #	Description	Pollutant	Emission limit	Regulation
003	24 TPH Old Shelling Plant with Baghouse common to Z036	PM	5.88 lb/hr (11.6 TPY)	ADEM Admin. Code R. 335-3-1404
003	24 TPH Old Shelling Plant with Baghouse common to Z036	Opacity	20% (6-minute average)	ADEM Admin Code R. 335-3-401(1)(a)&(b)

## **Provisos for 24 TPH Old Shelling Plant**

Federally Enforceable Provisos	Regulations	
Applicability		
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-1603	
2. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-401(1), "Visible Emissions".	ADEM Admin. Code R. 335-3-401(1)	
3. The source permitted under this unit has enforceable limits in place in order to prevent it from being subject to the provisions of ADEM Admin. Code R. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration].	ADEM Admin. Code R. 335-3-1404	
4. This source is subject to the applicable requirements of 40 CFR 64, "Compliance Assurance Monitoring", as described in General Proviso No. 33.	40 CFR 64	
Emission Standards		
1. This process shall not operate more than 4,000 hours during any consecutive twelve (12) month period.	ADEM Admin. Code R. 335-3-1404	
2. Particulate matter (PM) emissions from this process shall not exceed 5.88 lb/hr (11.6 TPY).	ADEM Admin. Code R. 335-3-1404	
Compliance and Performance Test Methods and Procedures		
1. If testing is required, particulate emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code R. 335-3-105	
2. If testing is required, visible emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code R. 335-3-105	
Emission Monitoring		
1. Emission monitoring requirements under 40 CFR 64, "Compliance Assurance Monitoring" can be found in the Appendix on Page 54.	40 CFR 64	
Recordkeeping and Reporting Requirements		
1. Records of the date, time, and observed opacity of the daily visible emissions observations, inspections, corrective actions taken, and maintenance of this source shall be recorded in a logbook. These records shall be retained for a minimum of five (5) years and made available upon request.	ADEM Admin. Code 335-3-1605(c)(2) 40 CFR 64	

Fe	derally Enforceable Provisos	Regulations
2.	The date, time, and daily baghouse pressure drop observations, for this source shall be recorded in a logbook. These records	ADEM Admin. Code 335-3-1605(c)(2)
	shall be retained for a minimum of five (5) years and made available upon request.	40 CFR 64
3.	Records of the process operating hours, including monthly and twelve (12) month rolling totals, shall be kept in a permanent form suitable for inspection. These records shall be retained for a minimum of five (5) years and made available upon request.	ADEM Admin. Code 335-3-1605(c)(2)
4.	A semi-annual report shall be submitted to the Air Division within 60 days of the end of the six (6) month reporting period. This report shall contain the following:	ADEM Admin. Code 335-3-1605(c)(3) 40 CFR 64
	(a) All visible emissions excursions to include the date, time, cause of the visible emissions excursion, and the corrective action taken.	40 CFR 04
	(b) All pressure drop excursions to include time, date, observed pressure drop, cause of the pressure drop excursions, and the corrective action taken.	
	(c) A statement certifying that the inspections were accomplished as required.	

## Summary Page for 30 TPH Farmer's Stock Cleaner

**Permitted Operating Schedule:** 4,380 Hrs/yr

Emission Point #	Description	Pollutant	Emission limit	Regulation
005	30 TPH Farmer's Stock Cleaner with Four (4) Cyclones	PM	E = $3.59P^{0.62}$ (when P < $30$ TPH) OR E = $17.31P^{0.16}$ (when P $\geq 30$ TPH)	ADEM Admin Code R. 335-3-404(1)
005	30 TPH Farmer's Stock Cleaner with Four (4) Cyclones	Opacity	20% (6-minute average)	ADEM Admin Code R. 335-3-401(1)(a)&(b)

### Provisos for 30 TPH Farmer's Stock Cleaner

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-1603
2. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-401(1), "Visible Emissions".	ADEM Admin. Code R. 335-3-401(1)
3. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-404, "Control of Particulate Emissions in Process Industries – General".	ADEM Admin. Code R. 335-3-404(1)
4. The source permitted under this unit has enforceable limits in place in order to prevent it from being subject to the provisions of ADEM Admin. Code R. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration].	ADEM Admin. Code R. 335-3-1404
Emission Standards	
1. This process shall not operate more than 4,380 hours during any consecutive twelve (12) month period.	ADEM Admin. Code R. 335-3-1404
Compliance and Performance Test Methods and Procedures	
<ol> <li>If testing is required, particulate emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 5.</li> </ol>	ADEM Admin. Code R. 335-3-105
2. If testing is required, visible emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 9	ADEM Admin. Code R. 335-3-105
Emission Monitoring	
1. When operating, the emission from the cyclones shall be visually observed a minimum of once daily to determine if visible emissions are greater than normal, as determined by previous observations.	ADEM Admin. Code R. 335-3-1605(c)(1)
2. Annual inspections of the cyclones shall be conducted no less frequently than annually, but more often whenever the observed visible emissions are greater than normal.	ADEM Admin. Code R. 335-3-1605(c)(1)
3. Whenever observed visible emissions are greater than normal, corrective actions shall be taken within four (4) hours, followed by an additional observation to confirm that emissions are reduced to normal.	ADEM Admin. Code R. 335-3-1605(c)(1)

Federally Enforceable Provisos	Regulations
Recordkeeping and Reporting Requirements	
1. Records of the process operating hours, including monthly and twelve (12) month rolling totals, shall be kept in a permanent form suitable for inspection. These records shall be retained for a minimum of five (5) years and made available upon request.	ADEM Admin. Code R. 335-3-1605(c)(2)
2. Records of the dates and times of cyclone visual observations, inspections, corrective actions taken, and maintenance performed shall be maintained in a logbook and made available for inspection. The records shall be retained for at least five (5) years from the date of generation.	ADEM Admin. Code R. 335-3-1605(c)(2)
3. A semi-annual report shall be submitted to the Air Division within 60 days of the end of the six (6) month reporting period. This report shall contain the following:	ADEM Admin. Code R. 335-3-1605(c)(3)
(a) A statement certifying that the inspections were performed as required;	
(b) Date and time any greater than normal visible emissions were observed; and	
(c) Records of any corrective action, maintenance, or inspections performed.	
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## **Summary Page for New Peanut Shelling Plant**

**Permitted Operating Schedule:** 4,500 Hrs/yr

Emission Point #	Description	Pollutant	Emission limit	Regulation
006A	24 TPH New Peanut Shelling Plant with Twenty-One (21) Cyclones	PM	E = 3.59P <sup>0.62</sup>	ADEM Admin Code R. 335-3-404(1)
006A	24 TPH New Peanut Shelling Plant with Twenty-One (21) Cyclones	Opacity	20% (6-minute average)	ADEM Admin Code R. 335-401(1)(a)&(b)
006B	4.5 Hull Bin and Truck Loadout System (New Shelling Plant)	Fugitive - PM	N/A	ADEM Admin. Code R. 335-3-402

## **Provisos for New Peanut Shelling Plant**

Federally Enforceable Provisos	Regulations	
Applicability		
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-1603	
2. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-401(1), "Visible Emissions".	ADEM Admin. Code R. 335-3-401(1)	
3. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-402, "Fugitive Dust and Fugitive Emissions".	ADEM Admin. Code R. 335-3-402	
4. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-404, "Control of Particulate Emissions in Process Industries – General".	ADEM Admin. Code R. 335-3-404(1)	
5. The source permitted under this unit has enforceable limits in place in order to prevent it from being subject to the provisions of ADEM Admin. Code R. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration].	ADEM Admin. Code R. 335-3-1404	
Emission Standards		
1. This process shall not operate more than 4,500 hours during any consecutive twelve (12) month period.	ADEM Admin. Code R. 335-3-1404	
Compliance and Performance Test Methods and Procedures		
1. If testing is required, particulate emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code R. 335-3-105	
2. If testing is required, visible emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 9	ADEM Admin. Code R. 335-3-105	
Emission Monitoring		
1. When operating, the emission from the cyclones shall be visually observed a minimum of once daily to determine if visible emissions are greater than normal, as determined by previous observations	ADEM Admin. Code R. 335-3-1605(c)(1)	
2. Annual inspections of the cyclones shall be conducted no less frequently than annually, but more often whenever the observed visible emissions are greater than normal.	ADEM Admin. Code R. 335-3-1605(c)(1)	

Federally Enforceable Provisos	Regulations
3. Whenever observed visible emissions are greater than normal, corrective actions shall be taken within four (4) hours, followed by an additional observation to confirm that emissions are reduced to normal.	ADEM Admin. Code R. 335-3-1605(c)(1)
Recordkeeping and Reporting Requirements	
1. Records of the process operating hours, including monthly and twelve (12) month rolling totals, shall be kept in a permanent form suitable for inspection. These records shall be retained for a minimum of five (5) years and made available upon request.	ADEM Admin. Code R. 335-3-1605(c)(2)
2. Records of the dates and times of cyclone visual observations, inspections, corrective actions taken, and maintenance performed shall be maintained in a logbook and made available for inspection. The records shall be retained for at least five (5) years from the date of generation.	ADEM Admin. Code R. 335-3-1605(c)(2)
3. A semi-annual report shall be submitted to the Air Division within 60 days of the end of the six (6) month reporting period. This report shall contain the following:	ADEM Admin. Code R. 335-3-1605(e)(3)
(a) A statement certifying that the inspections were performed as required;	
(b) Date and time any greater than normal visible emissions were observed; and	
(c) Records of any corrective action, maintenance, or inspections performed.	

## Summary Page for 12 TPH Farmer's Stock Peanut Seed Cleaner

Permitted Operating Schedule: 700 Hrs/yr

Emission Point #	Description	Pollutant	Emission limit	Regulation
007	12 TPH Farmer's Stock Peanut Seed Cleaner with Three (3) Cyclones	PM	E = 3.59P <sup>0.62</sup>	ADEM Admin Code R. 335-3-404(1)
007	12 TPH Farmer's Stock Peanut Seed Cleaner with Three (3) Cyclones	Opacity	20% (6-minute average)	ADEM Admin Code R. 335-401(1)(a)&(b)

# Provisos for 12 TPH Farmer's Stock Peanut Seed Cleaner

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-1603
2. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-401(1), "Visible Emissions".	ADEM Admin. Code R. 335-3-401(1)
3. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-404, "Control of Particulate Emissions in Process Industries – General".	ADEM Admin. Code R. 335-3-404(1)
4. The source permitted under this unit has enforceable limits in place in order to prevent it from being subject to the provisions of ADEM Admin. Code R. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration].	ADEM Admin. Code R. 335-3-1404
Emission Standards	
1. This process shall not operate more than 700 hours during any consecutive twelve (12) month period.	ADEM Admin. Code R. 335-3-1404
Compliance and Performance Test Methods and Procedures	
1. If testing is required, particulate emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code R. 335-3-105
2. If testing is required, visible emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 9	ADEM Admin. Code R. 335-3-105
Emission Monitoring	
1. When operating, the emission from the cyclones shall be visually observed a minimum of once daily to determine if visible emissions are greater than normal, as determined by previous observations.	ADEM Admin. Code R. 335-3-1605(c)(1)
2. Annual inspections of the cyclones shall be conducted no less frequently than annually, but more often whenever the observed visible emissions are greater than normal.	ADEM Admin. Code R. 335-3-1605(c)(1)
3. Whenever observed visible emissions are greater than normal, corrective actions shall be taken within four (4) hours, followed by an additional observation to confirm that emissions are reduced to normal.	ADEM Admin. Code R. 335-3-1605(c)(1)

Federally Enforceable Provisos	Regulations
Recordkeeping and Reporting Requirements	
1. Records of the process operating hours, including monthly and twelve (12) month rolling totals, shall be kept in a permanent form suitable for inspection. These records shall be retained for a minimum of five (5) years and made available upon request.	ADEM Admin. Code R. 335-3-1605(c)(2)
2. Records of the dates and times of cyclone visual observations, inspections, corrective actions taken, and maintenance performed shall be maintained in a logbook and made available for inspection. The records shall be retained for at least five (5) years from the date of generation.	ADEM Admin. Code R. 335-3-1605(c)(2)
3. A semi-annual report shall be submitted to the Air Division within 60 days of the end of the six (6) month reporting period. This report shall contain the following:	ADEM Admin. Code R. 335-3-1605(c)(3)
(a) A statement certifying that the inspections were performed as required;	
(b) Date and time any greater than normal visible emissions were observed; and	
(c) Records of any corrective action, maintenance, or inspections performed.	
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# Summary Page for 25.1 MMBtu/hr Boiler

**Permitted Operating Schedule:** 8,760 Hrs/yr

### **Emission limitations:**

Emission Point #	Description	Pollutant	Emission limit	Regulation
008	25.1 MMBtu/hr Natural Gas and LPG Fired Cleaver Brooks Boiler (Oil Mill)	PM	E = 1.38H <sup>-0.44</sup>	ADEM Admin. Code R. 335-3-403(1)
008	25.1 MMBtu/hr Natural Gas and LPG Fired Cleaver Brooks Boiler (Oil Mill)	$\mathrm{SO}_2$	Permitted to burn only Natural Gas and Propane (LPG)	ADEM Admin. Code R. 335-3-1404
008	25.1 MMBtu/hr Natural Gas and LPG Fired Cleaver Brooks Boiler (Oil Mill)	$NO_x$	N/A	N/A
008	25.1 MMBtu/hr Natural Gas and LPG Fired Cleaver Brooks Boiler (Oil Mill)	СО	N/A	N/A
008	25.1 MMBtu/hr Natural Gas and LPG Fired Cleaver Brooks Boiler (Oil Mill)	VOC	N/A	N/A
008	25.1 MMBtu/hr Natural Gas and LPG Fired Cleaver Brooks Boiler (Oil Mill)	Opacity	20% (6-minute average)	ADEM Admin Code R. 335-3-401(1)(a)&(b)

# Provisos for 25.1 MMBtu/hr Boiler

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-1603
2. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-401(1), "Visible Emissions".	ADEM Admin. Code R. 335-3-401(1)
3. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-403(1), "Control of Particulate Emissions - Fuel Burning Equipment".	ADEM Admin. Code R. 335-3-403(1)
4. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-501(1), "Control of Sulfur Compound Emissions - Fuel Combustion".	ADEM Admin. Code R. 335-3-501(1)
5. The source permitted under this unit has enforceable limits in place in order to prevent it from being subject to the provisions of ADEM Admin. Code R. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration].	ADEM Admin. Code R. 335-3-1404
Emission Standards	
1. This boiler is permitted to burn only natural gas and/or propane (LPG).	ADEM Admin. Code R. 335-3-1404
Compliance and Performance Test Methods and Procedures	
<ol> <li>If testing is required, particulate emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 5.</li> </ol>	ADEM Admin. Code R. 335-3-105
2. If testing is required, $SO_2$ emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 6.	
3. If testing is required, visible emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code R. 335-3-105
Emission Monitoring	
1. Records of fuel usage shall be kept in a permanent form suitable for inspection for a period of five (5) years from the date of generation in order to demonstrate that only natural gas and/or propane gas (LPG) was burned in this boiler.	ADEM Admin. Code R. 335-3-1605(c)(1)

Federally Enforceable Provisos	Regulations
Recordkeeping and Reporting Requirements	
<ol> <li>A semi-annual report shall be submitted to the Air Division within 60 days of the end of the six (6) month reporting period. The semi-annual report shall include a statement certifying that only natural gas and/or propane (LPG) gas was burned in the boiler during the reporting period.</li> </ol>	ADEM Admin. Code R. 335-3-1605(c)(3)

# **Summary Page for Peanut Oil Extraction Process**

Permitted Operating Schedule: 8,760 Hrs/yr

### **Emission limitations:**

Emission Point #	Description	Pollutant	Emission limit	Regulation
009	Peanut Oil Extraction Process with 20,000 gallon Hexane Solvent Storage Tank with Mineral Oil Absorption System	PM	E=3.59P <sup>0.62</sup>	ADEM Admin Code R. 335-3-404(1)
009	Peanut Oil Extraction Process with 20,000 gallon Hexane Solvent Storage Tank with Mineral Oil Absorption System	VOC	245 TPY Based on 87,500 gallons of solvent/yr	ADEM Admin. Code R. 335-3-1404
009	Peanut Oil Extraction Process with 20,000 gallon Hexane Solvent Storage Tank with Mineral Oil Absorption System	НАР	Compliance ratio shall not exceed 1.00	40 CFR 63.2840(c)
009	Peanut Oil Extraction Process with 20,000 gallon Hexane Solvent Storage Tank with Mineral Oil Absorption System	Opacity	20% (6-minute average)	ADEM Admin Code R. 335-3-401(1)(a)&(b)

# **Provisos for Peanut Oil Extraction Process**

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits"	ADEM Admin. Code R. 335-3-1603
2. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-401(1), "Visible Emissions".	ADEM Admin. Code R. 335-3-401(1)
3. Emission point EX-2 is subject to the applicable requirements of ADEM Admin. Code R. 335-3-404(1), "Process Industries – General"	ADEM Admin. Code R. 335-3-404(1)
4. This source is subject to the applicable requirements of 40 CFR 63 Subpart GGGG, "National Emissions Standards for Hazardous Air Pollutants for Solvent Extraction for Vegetable Oil Production".	40 CFR 63 Subpart GGGG §63.2832(a)(1)&(2)
5. The source permitted under this unit has enforceable limits in place in order to prevent it from being subject to the provisions of ADEM Admin. Code R. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration	ADEM Admin. Code R. 335-3-1404
Emission Standards	
1. This process shall not use more than 87,500 gallons (245 TPY) of hexane solvent during any consecutive twelve (12) month period.	ADEM Admin. Code R. 335-3-1404
2. This facility shall maintain a compliance ratio of less than or equal to 1.00 of actual solvent loss to allowable solvent loss. The allowable solvent loss is a function of the oilseed processed and the solvent loss factor (SLF) for this facility.	40 CFR 63 Subpart GGGG §63.2840(c)
Compliance and Performance Test Methods and Procedures	
1. If testing is required, particulate emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code R. 335-3-105
2. If testing is required, visible emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 9.	ADEM Admin. Code R. 335-3-105
3. If performance testing is required, volatile organic compound emissions from this process shall be measured in accordance with 40 CFR Part 63.2850(a)(6).	40 CFR 63 Subpart GGGG §63.2850(a)(6)
	300.200(a)(0)

### **Federally Enforceable Provisos** Regulations 4. The facility shall keep a copy of the compliance plan and the 40 CFR 63 Subpart startup, shutdown, and malfunction (SSM) plan on-site and **GGGG** readily available as long as the source is operational. These §63.2851 & §63.2852 plans shall provide detailed procedures for operating and maintaining this source to minimize emissions, and must specify a program of corrective action for malfunctioning process and air pollution control equipment and reflect the best practices now in use by the industry to minimize emissions. 5. The solvent loss factor (SLF) for this facility, as determined by 40 CFR 63 Subpart Table 1 of §63.2840, shall be 1.2 gallons of solvent lost per ton of **GGGG** oilseed processed for peanut processing at an existing source. §63.2834(d) 6. The compliance ratio shall be calculated using either of the 40 CFR 63 Subpart following equations: **GGGG** §63.2840(a)(1)&(2) Compliance Ratio = $\frac{\text{Actual Hap Loss}}{\text{Allowable Hap Loss}}$ or $Compliance Ratio = \frac{f * Actual Solvent Loss}{0.64 * \sum_{i=1}^{n} ((Oilseed)_i * (SLF)_i)}$ Where: f = The weighted average volume fraction of HAP in solvent received during the previous 12 operating months. 0.64 = The average volume fraction of HAP in solvent in the

baseline performance data

previous 12 operating months

previous 12 operating months

Actual Solvent Loss = Gallons of actual solvent loss during

Oilseed = Tons of each oilseed type "i" processed during the

SLF = The corresponding solvent loss factor (gal/ton) for oilseed

#### **Federally Enforceable Provisos**

#### Regulations

7. The following equation shall be used to determine the actual solvent loss occurring from the affected source for all normal operating periods recorded within a calendar month:

40 CFR 63 Subpart **GGGG** 

$$\begin{aligned} & \text{Monthly Actual} \\ & \text{Solvent} \\ & (\text{gal}) \end{aligned} = \sum_{i=1}^{n} \left( \text{SOLV}_{\text{B}} - \text{SOLV}_{\text{E}} + \text{SOLV}_{\text{R}} \pm \text{SOLV}_{\text{A}} \right)_{i} \end{aligned}$$

§63.2853(b)

#### Where:

SOLV<sub>B</sub> = Gallons of solvent in the inventory at the beginning of normal operating period "i" SOLVE = Gallons of solvent in the inventory at the end of normal operating period "i"

SOLV<sub>R</sub> = Gallons of solvent received between the beginning and ending inventory dates of normal operating period "i"

SOLV<sub>A</sub> = Gallons of solvent added or removed from the extraction solvent inventory during normal operating period "i"

n = Number of normal operating periods in a calendar month

8. The monthly weighted average volume fraction of HAP shall be calculated using the following equation:

40 CFR 63 Subpart **GGGG** 

§63.2854(b)(2)

$$\begin{aligned} & & \text{Monthly Weighted} \\ & & \text{Average HAP Content} \\ & & \text{of Extraction Solvent} \\ & & \text{(volume fraction)} \end{aligned} = \frac{\sum_{i=1}^{n} \left( \text{Received}_{i} * \text{Content}_{i} \right)}{\text{Total Received}}$$

#### Where:

Received<sub>i</sub> = Gallons of extraction solvent received in delivery "i."

Content<sub>i</sub> = The volume fraction of HAP in extraction solvent delivery "i."

Total Received = Total gallons of extraction solvent received since the end of the previous operating month

n = Number of extraction solvent deliveries since the end of the previous operating month

### **Federally Enforceable Provisos**

(volume fraction)

### Regulations

9. The twelve-month weighted average volume fraction of HAP shall be calculated using the following equation:

12-Month Weighted
Average of HAP Content
in Solvent Received  $= \frac{\sum_{i=1}^{12} (Received_i * Content_i)}{Total Received}$ 

40 CFR 63 Subpart GGGG

§63.2854(b)(3)

Where:

Received $_{i}$  = Gallons of extraction solvent received in operating month "i"

Content<sub>i</sub> = Average volume fraction of HAP in extraction solvent received in operating month "i"

Total Received = Total gallons of extraction solvent received during the previous 12 operating months

10.Monthly oilseed processed shall be determined using the following equation:

 $\begin{array}{l} \text{Monthly Quantity} \\ \text{of Each Oilseed} \\ \text{Processed (tons)} \end{array} = \sum_{n=1}^{n} \bigl( \text{SEED}_{\text{B}} - \text{SEED}_{\text{E}} + \text{SEED}_{\text{R}} \pm \text{SEED}_{\text{A}} \bigr) \end{array}$ 

40 CFR 63 Subpart GGGG

§63.2855(b)

Where:

SEEDB = Tons of oilseed in the inventory at the beginning of normal operating period "i"

SEEDE = Tons of oilseed in the inventory at the end of normal operating period "i"

SEEDR = Tons of oilseed received during normal operating period "i"

SEEDA = Tons of oilseed added or removed from the oilseed inventory during normal operating period "i"

n = Number of normal operating periods

- 11. The twelve-month actual solvent loss shall be the sum of each monthly actual solvent loss for the previous twelve month period.
- monthly actual solvent loss for the previous twelve month period
- 12. The twelve-month volume of peanuts processed shall be the sum of the monthly volumes of peanuts process for the previous twelve month period.
- 13. The volume fraction of n-Hexane in the solvent shall be obtained from the manufacturer's Material Safety Data Sheet (MSDS) or a manufacturer's certificate of analysis.

40 CFR 63 Subpart GGGG

§63.2853(a)

40 CFR 63 Subpart GGGG

§63.2855(a)

40 CFR 63 Subpart GGGG

§63.2854(2)

Fe	derally Enforceable Provisos	Regulations
Er	nission Monitoring	
1.	When operating, the emission from the cyclones shall be visually observed a minimum of once daily to determine if visible emissions are greater than normal, as determined by previous observations.	ADEM Admin. Code R. 335-3-1605(c)(1)
2.	Annual inspections of the cyclones shall be conducted no less frequently than annually, but more often whenever the observed visible emissions are greater than normal.	ADEM Admin. Code R. 335-3-1605(c)(1)
3.	Whenever observed visible emissions are greater than normal, corrective actions shall be taken within four (4) hours, followed by an additional observation to confirm that emissions are reduced to normal.	ADEM Admin. Code R. 335-3-1605(c)(1)
	By the end of each calendar month, the monthly total solvent loss in gallons and the compliance ratio shall be determined for the previous operating month.  **Cordkeeping and Reporting Requirements**	40 CFR 63 Subpart GGGG §63.2853
1.	Records of the dates and times of cyclone visual observations, inspections, corrective actions taken, and maintenance performed shall be maintained in a logbook and made available for inspection. The records shall be retained for at least five (5) years from the date of generation.	ADEM Admin. Code R. 335-3-1605(c)(2)
2.	A semi-annual report shall be submitted to the Air Division within 60 days of the end of the six (6) month reporting period. This report shall contain the following:	ADEM Admin. Code R. 335-3-1605(c)(3)
	(a) A statement certifying that the inspections were performed as required;	
	(b) Date and time any greater than normal visible emissions were observed; and	
	(c) Records of any corrective action, maintenance, or inspections performed.	
2.	The compliance demonstration plan and SSM plan shall be kept on-site in a permanent form suitable for inspection and made available upon request. These reports shall be kept for the life of the facility.	40 CFR 63 Subpart GGGG §63.2862(b)&(e)
3.	Monthly and twelve (12) month rolling totals of hexane solvent usage shall be kept in a permanent form suitable for inspection and made available upon request. These records shall be kept for a period of five (5) years from the date of generation.	40 CFR 63 Subpart GGGG §63.2861(c) & (d)

Fe	derally Enforceable Provisos	Regulations
4.	Records of the monthly and twelve (12) month rolling total of actual solvent loss shall be kept in a permanent form suitable for inspection and made available upon request. These records shall be maintained for a period of five (5) years from the date of generation.	40 CFR 63 Subpart GGGG §63.2862(c)
5.	Records of the monthly and twelve (12) month rolling totals (in tons) of oilseed processed shall be kept in a permanent form suitable for inspection and made available upon request. These records shall be maintained for a period of five (5) years from the date of generation.	40 CFR 63 Subpart GGGG §63.2862(c)
6.	Records of the monthly and twelve (12) month compliance ratios shall be kept in a permanent form suitable for inspection and made available upon request. These records shall be maintained for a period of five (5) years from the date of generation.	40 CFR 63 Subpart GGGG §63.2862(c)
7.	Records of the volume fraction of each HAP in each delivery of extraction solvent shall be kept in a permanent form suitable for inspection and made available upon request. These records shall be maintained for a period of five (5) years from the date of generation.	40 CFR 63 Subpart GGGG §63.2862(c)
8.	Records of the total gallons of extraction solvent received in each delivery shall be kept in a permanent form suitable for inspection and made available upon request. These records shall be maintained for a period of five (5) years from the date of generation.	40 CFR 63 Subpart GGGG §63.2862(c)
9.	Records of the monthly weighted average volume fraction of HAP in the extraction solvent for the previous twelve (12) months shall be kept in a permanent form suitable for inspection and made available upon request. These records shall be maintained for a period of five (5) years from the date of generation.	40 CFR 63 Subpart GGGG §63.2862(c)
10	Manufacturer supplied certificates of analysis or Material Safety Data Sheets (MSDS) for the hexane solvent shall be kept in a permanent form suitable for inspection for a period of five (5) years from the date of generation and shall be made available upon request.	40 CFR 63 Subpart GGGG §63.2862(c)
11	.A Notification of Compliance Status report must be submitted to the Department no later then 60 days after determining your initial 12 operating months compliance ratio. The notification of compliance status report must contain the following items:	40 CFR 63 Subpart GGGG §63.2860(d)
	(a) The name and address of the owner or operator.	
	(b) The physical address of the vegetable oil production process.	
	(c) Each listed oilseed type processed during the previous 12 operating months.	

#### **Federally Enforceable Provisos**

#### Regulations

- (d) Each HAP present in concentrations greater than one (1%) percent by volume in each delivery of solvent received during the twelve (12) operating months period used for the initial compliance determination.
- (e) A statement designating the source as a major source of HAP or a demonstration that the source qualifies as an area source.
- (f) A compliance certification indicating whether the source complied with all of the requirements of this subpart throughout the 12 operating months used for the initial source compliance determination.
- (g) Certification that the plan for demonstrating compliance and SSM plan are complete and available on-site for inspection.
- (h) Certification that the facility is following the procedures described in the plan for demonstrating compliance.
- (i) Certification that the compliance ratio is less than or equal to 1.00.
- 13.An annual MACT compliance certification is due at the Department 12 calendar months after submitting the notification of compliance status. Each subsequent annual MACT compliance certification is due 12 calendar months after the previous annual compliance certification. The annual MACT compliance certification provides the compliance status for each operating month during the 12 calendar months period ending 60 days prior to the date on which the report is due. This report shall include the following:
  - (a) The name and address of the owner or operator.
  - (b) The physical address of the vegetable oil production process.
  - (c) Each listed oilseed type processed during the 12 calendar months period covered by the report.
  - (d) Each HAP present in concentrations greater than 1 percent by volume in each delivery of solvent received during the 12 calendar months period covered by the report.
  - (e) A statement designating the source as a major source of HAP or a demonstration that the source qualifies as an area source.

40 CFR 63 Subpart GGGG §63.2861(a)

Federally Enforceable Provisos	Regulations
(f) A compliance certification to indicate whether the source was in compliance for each compliance determination made during the 12 calendar months period covered by the report.	
(g) Certification that the facility is following the procedures described in the plan for demonstrating compliance.	
(h) Certification that the compliance ratio is less than or equal to 1.00.	
14.A deviation notification report shall be submitted to the Department for each instance that the calculated compliance ratio exceeds 1.00. This report shall be received by the Department by no later than the last day of the month following the calendar month in which the deviation occurred.	40 CFR 63 Subpart GGGG §63.2861(b)
15.A semi-annual SSM report stating that actions were taken that were consistent with the procedures in the SSM plan. The report shall be submitted to the Department by no later than the 30 <sup>th</sup> day following the end of the six month reporting period. This report shall include the following information:	40 CFR 63 Subpart GGGG §63.2861(c)&(d)
(a) Instances in which actions were taken that were not consistent with the SSM plan, but the source did not exceed any applicable emission limit.	
(b) The number, duration, and a brief description of each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limit to be exceeded.	
(c) A statement containing the name, title, and signature of the owner or operator or other responsible official certifying that the information contained in the report is true, accurate, and complete.	

# Summary Page for 20 TPH Hopper Car Meal Loadout

**Permitted Operating Schedule:** 3,732 Hrs/yr

### **Emission limitations:**

Emission Point #	Description	Pollutant	Emission limit	Regulation
010	20 TPH Hopper Car Meal Loadout with Hood and Cyclone and Totally Enclosed Truck Meal Loadout (Oil Mill)	PM	lb/hr (5.03 TPY)	ADEM Admin Code R. 335-3-404(1)
010	20 TPH Hopper Car Meal Loadout with Hood and Cyclone and Totally Enclosed Truck Meal Loadout (Oil Mill)	Opacity	20% (6-minute average)	ADEM Admin Code R. 335-401(1)(a)&(b)

# **Provisos for 20 TPH Hopper Car Meal Loadout**

Fe	ederally Enforceable Provisos	Regulations
Aŗ	plicability	
1.	This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-1603, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-1603
2.	This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-401(1), "Visible Emissions".	ADEM Admin. Code R. 335-3-401(1)
3.	The source permitted under this unit has enforceable limits in place in order to prevent it from being subject to the provisions of ADEM Admin. Code R. 335-3-1404, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration].	ADEM Admin. Code R. 335-3-1404
Er	nission Standards	
1.	This process shall not operate more than 3,732 hours during any consecutive twelve (12) month period.	ADEM Admin. Code R. 335-3-1404
2.	Particulate matter (PM) emissions from this unit shall not exceed $2.70\ lb/hr$ (5.03 TPY).	ADEM Admin. Code R. 335-3-1404
Co	empliance and Performance Test Methods and Procedures	
1.	If testing is required, particulate emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 5.	ADEM Admin. Code R. 335-3-105
2.	If testing is required, visible emissions from this process shall be measured in accordance with 40 CFR Part 60, Appendix A, Method 9	ADEM Admin. Code R. 335-3-105
Er	nission Monitoring	
1.	When operating, the emission from the cyclones shall be visually observed a minimum of once daily to determine if visible emissions are greater than normal, as determined by previous observations.	ADEM Admin. Code R. 335-3-1605(c)(1)
2.	Annual inspections of the cyclones shall be conducted no less frequently than annually, but more often whenever the observed visible emissions are greater than normal.	ADEM Admin. Code R. 335-3-1605(c)(1)
3.	Whenever observed visible emissions are greater than normal, corrective actions shall be taken within four (4) hours, followed by an additional observation to confirm that emissions are reduced to normal.	ADEM Admin. Code R. 335-3-1605(c)(1)

Federally Enforceable Provisos	Regulations
Recordkeeping and Reporting Requirements	
1. Records of the process operating hours, including monthly and twelve (12) month rolling totals, shall be kept in a permanent form suitable for inspection. These records shall be retained for a minimum of five (5) years and made available upon request	ADEM Admin. Code R. 335-3-1605(c)(2)
2. Records of the dates and times of cyclone visual observations, inspections, corrective actions taken, and maintenance performed shall be maintained in a logbook and made available for inspection. The records shall be retained for at least five (5) years from the date of generation.	ADEM Admin. Code R. 335-3-1605(c)(2)
3. A semi-annual report shall be submitted to the Air Division within 60 days of the end of the six (6) month reporting period. This report shall contain the following:	ADEM Admin. Code R. 335-3-1605(c)(3)
(a) A statement certifying that the inspections were performed as required;	
(b) Date and time any greater than normal visible emissions were observed; and	
(c) Records of any corrective action, maintenance, or inspections performed.	
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### **APPENDIX**

## 40 CFR 64

Compliance Assurance Monitoring (CAM) Requirements

## **CAM Plan for Emissions Point 002**

	Parameter No.1	Parameter No. 2
Indicator	Visible Emissions (VE)	Pressure Differential (ΔP)
A. Measurement Approach	Trained and qualified personnel shall perform a daily VE inspection.	1. A properly maintained and operated device shall be utilized to measure ΔP across the baghouse. The device shall be located at eye level and be easily accessible for inspections by Air Division and plant personnel.
Indicator Range	<ol> <li>While the unit is operating, an excursion is defined as the presence of VE.</li> <li>Excursions trigger an inspection, corrective action, and a reporting requirement.</li> <li>The baghouse shall be inspected and cleaned no less frequently than annually.</li> <li>Corrective action must be taken within four (4) hours when visible emissions are observed.</li> </ol>	<ol> <li>While the unit is operating, an excursion is defined as a ΔP of less than one (1.0) in H<sub>2</sub>O or greater than eight (8.0) in H<sub>2</sub>O.</li> <li>Excursions trigger an inspection, corrective action, and a reporting requirement.</li> <li>When a pressure drop excursion occurs, corrective action shall be taken within four (4) hours to identify and correct the problem.</li> </ol>
Pouformon on Cuitouia		
Performance Criteria		
A. Data Representativeness	Measurement shall be made at the emission point (baghouse exhaust).	<ol> <li>ΔP on gauge is the measurement of pressure differential between inlet and outlet of the baghouse.</li> </ol>
B. Verification of Operating Status	N/A	N/A

C. QA/QC Practices and Criteria	Trained and qualified personnel shall perform the visible inspection.	The differential pressure gauge shall be calibrated at least annually.
	2. Maintenance shall be performed as needed.	
D. Monitoring Frequency	1. Visible emissions observation shall be monitored and recorded daily while the unit is in operation.	1. ΔP shall be monitored and recorded daily while the unit is in operation.
E. Data Collection Procedures	1. Manual log entries based on VE observation. Observation will be recorded along with the date, time, and name of the observer.	1. Manual log entries based on gauge readings. ΔP will be recorded along with the date, time, and name of the observer.
F. Averaging Period	VE observations are instantaneous.	<ol> <li>ΔP readings are instantaneous.</li> </ol>